

## 2 COMBINED MONITORING REPORT

In accordance with Title V Permit Standard Condition 1.F, BAAQMD Rule 8-34-411 and §60.757(f) in the NSPS, this report is a Combined Semi-Annual Title V Report and Partial 8-34 Annual Report that is required to be submitted by BFI. The report contains monitoring data for the operation of the landfill gas collection and control system (GCCS). The operational records have been reviewed and summarized. The timeframe covered by this report is October 1, 2016 through March 31, 2017. The following table lists the rules and regulations that are required to be included in this Combined Report.

**TABLE 2-1 - COMBINED REPORT REQUIREMENTS**

Rule	Requirement	Location in Report
8-34-501.1 §60.757(f)(4)	All collection system downtime, including individual well shutdown times and the reason for the shutdown.	Section 2.1 , Appendices C & E
8-34-501.2 §60.757(f)(3)	All emission control system downtime and the reason for the shutdown.	Section 2.2, Appendix D
8-34-501.3, 8-34-507, §60.757(f)(1)	Continuous temperature for all operating flares and any enclosed combustor subject to Section 8-34-507.	Section 2.3, Appendix F
8-34-501.4, 8-34-510	Monitoring and/or testing performed to satisfy the requirements of the rules.	Section 2.4, Appendix G
8-34-501.6, 8-34-503, 8-34-506, §60.757(f)(5)	For operations subject to Section 8-34-503 and 8-34-506, records of all monitoring dates, leaks in excess of the limits in Section 8-34-301.2 or 8-34-303 that are discovered by the operator, including the location of the leak, leak concentration in parts per million by volume (ppmv), date of discovery, the action taken to repair the leak, date of the repair, date of any required re-monitoring, and the re-monitored concentration in ppmv.	Section 2.6 & 2.7, Appendices H & I
8-34-501.7	Annual waste acceptance rate and current amount of waste in-place (WIP).	Section 2.8
8-34-501.8	Records of the nature, location, amount, and date of deposition of non-degradable wastes, for any landfill areas excluded from the collection system requirement as documented in the GCCS Design Plan.	Section 2.9
8-34-501.4, 8-34-501.9, 8-34-505, §60.757(f)(1)	For operations subject to Section 8-34-505, records of all monitoring dates and any excesses of the limits stated in Section 8-34-305 that are discovered by the operator, including well identification number, the measured excess, the action taken to repair the excess, and the date of repair. Allowed higher operating value (HOV) wells excluded from the limits are listed here as well.	Section 2.10, 2.10.1, 2.10.2, Appendices J & K
8-34-501.10, 8-34-508, §60.757(f)(1)	Continuous gas flow rate and temperature records for any site subject to Section 8-34-508.	Section 2.11, Appendices F and L
8-34-501.12	The records required above shall be made available and retained for a period of five years.	Section 1.2

Rule	Requirement	Location in Report
§60.757(f)(1)	Value and length of time for exceedance of parameters monitored per §60.756(a), (b), or (d).	Section 2.3
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(3)	Description and duration of all periods when control devices were not operating for more than 1 hour §60.756.	Section 2.2, Appendix D
§60.757(f)(4)	All periods when collection system was not operating for more than 5 days.	Section 2.1
§60.757(f)(5)	Location of each surface emission excess and all re-monitoring dates and concentration.	Section 2.6, Appendix H
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.12, Appendices B & C

## 2.1 Collection System Operation (BAAQMD 8-34-501.1 & §60.757(f)(4))

Appendix A contains a map of Ox Mountain's GCCS. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Appendix C includes the individual well start-up and shutdown times and the reason for the SSM events.

### 2.1.1 Collection System Downtime

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. There were 138.27 hours of GCCS downtime for the reporting period of October 1, 2016 through March 31, 2017. The total downtime for 2016 was 75.58 hours out of an allowable 240 hours per year. The total downtime for 2017 was 99.08 hours out of an allowable 240 hours per year.

Appendix D contains the A-7, A-8, and A-9 Flares and the Ameresco Internal Combustion (IC) engines Downtime Reports which list dates, times, and lengths of shutdowns for the reporting period. Appendix E contains the GCCS Downtime.

### 2.1.2 Well Start-Up & Disconnection Log

There were 12 wellfield SSM events that occurred during the reporting period. A total of four wells were started-up, pursuant to BAAQMD Regulation 8-34-117. See Appendix C, Wellfield SSM Log for details.

## **2.2 Emission Control Device Downtime (BAAQMD 8-34-501.2 & §60.757(f)(3))**

The emission control system consists of three flares (A-7, A-8, and A-9), which all began operation in 2004 and the six IC Engines operated by Ameresco. The six IC Engines are under a separate permit and are reported by a third-party. The control system was not bypassed at any time during the reporting period. Raw landfill gas (LFG) was not emitted during the reporting period. The SSM logs for the A-7, A-8, and A-9 Flares and the IC Engines are located in Appendix D.

### **2.2.1 LFG Bypass Operations ((§60.757(f)(2))**

Title 40 CFR §60.757(f)(2) is not applicable at Ox Mountain because a bypass line has not been installed. LFG cannot be diverted from the control equipment.

## **2.3 Temperature Monitoring Results (BAAQMD 8-34-501.3, 8-34-507, & §60.757(f)(1))**

The combustion zone temperatures of the flares are monitored with Thermo-Electric Thermocouples. The temperature is displayed with a Yokogawa digital recorder, which is downloaded and archived. There were no temperature deviations during the reporting period. Appendix F contains the Flare Flow and Temperature Deviation/Inoperative Monitor/Missing Data Reports for October 1, 2016 through March 31, 2017.

## **2.4 Monthly Cover Integrity Monitoring(BAAQMD 8-34-501.4 & 8-34-510)**

The cover integrity monitoring was performed on the following dates:

- October 27, 2016;
- November 30, 2016;
- December 29, 2016;
- January 30, 2017;
- February 27, 2017; and
- March 30, 2017.

The Monthly Cover Integrity Monitoring Logs are included in Appendix G.

Rule	Requirement	Location in Report
§60.757(f)(1)	Value and length of time for exceedance of parameters monitored per §60.756(a), (b), or (d).	Section 2.3
§60.757(f)(2)	Description and duration of all periods when the gas stream is diverted from the control device through a bypass line or the indication of bypass flow as specified under §60.756.	Section 2.2.1
§60.757(f)(3)	Description and duration of all periods when control devices were not operating for more than 1 hour §60.756.	Section 2.2, Appendix D
§60.757(f)(4)	All periods when collection system was not operating for more than 5 days.	Section 2.1
§60.757(f)(5)	Location of each surface emission excess and all re-monitoring dates and concentration.	Section 2.6, Appendix H
§60.757(f)(6)	The date of installation and the location of each well or collection system expansion added pursuant to paragraphs (a)(3), (b), (c)(4) of §60.755.	Section 2.12, Appendices B & C

## 2.1 Collection System Operation (BAAQMD 8-34-501.1 & §60.757(f)(4))

Appendix A contains a map of Ox Mountain's GCCS. Section 2.1.1 includes the GCCS downtime for the reporting period. The information contained in Appendix C includes the individual well start-up and shutdown times and the reason for the SSM events.

### 2.1.1 Collection System Downtime

During the period covered in this report, the GCCS was not shut down for more than five days on any one occasion. There were 138.27 hours of GCCS downtime for the reporting period of October 1, 2016 through March 31, 2017. The total downtime for 2016 was 75.58 hours out of an allowable 240 hours per year. The total downtime for 2017 was 99.08 hours out of an allowable 240 hours per year.

Appendix D contains the A-7, A-8, and A-9 Flares and the Ameresco Internal Combustion (IC) engines Downtime Reports which list dates, times, and lengths of shutdowns for the reporting period. Appendix E contains the GCCS Downtime.

### 2.1.2 Well Start-Up & Disconnection Log

There were 12 wellfield SSM events that occurred during the reporting period. A total of four wells were started-up, pursuant to BAAQMD Regulation 8-34-117. See Appendix C, Wellfield SSM Log for details.

Refer to the Quarterly LFG Component Leak Monitoring Logs, located in Appendix I, for detailed results.

## **2.9 Waste Acceptance Records (BAAQMD 8-34-501.7)**

The amount of waste accepted during the reporting period of October 1, 2016 through March 31, 2017 was approximately 325,744.6 tons. The current Waste-In-Place (WIP) as of March 31, 2017 is approximately 24,920,818.07 tons.

## **2.10 Non-Degradable Waste Acceptance Records (BAAQMD 8-34-501.8)**

The GCCS Design Plan for Ox Mountain excludes non-degradable waste areas from the collection system. Therefore, BAAQMD Regulation 8-34-501.8 is not applicable.

## **2.11 Wellhead Monitoring Data (BAAQMD 8-34-501.4 & 8-34-505)**

Wellhead monitoring was performed on a monthly basis pursuant to 8-34-505. The well readings for October 1, 2016 through March 31, 2017 are included in Appendix J. Each well was monitored in accordance with the following requirements:

- 8-34-305.1 – Each wellhead shall operate under a vacuum;
- 8-34-305.2 – The LFG temperature in each wellhead shall be less than 55 degrees Celsius (°C) (131 degrees Fahrenheit [°F]); and
- 8-34-305.4 – The oxygen concentration in each wellhead shall be less than five percent by volume.

Wellhead monitoring was performed on the following dates:

- October 3, 4, 10, 11, 17, 18, and 27, 2016;
- November 1, 7, 8, 15, 21, 22, and 28, 2016;
- December 5, 12, 13, 17, 19, 21, 27, and 29, 2016;
- January 2, 3, 9, 14, 16, 17, 24, and 30, 2017;
- February 6, 7, 14, 16, and 27, 2017; and
- March 2, 6, 13, 27, and 30, 2017.

### **2.11.1 Wellhead Deviations (BAAQMD 8-34-501.9 & §60.757(f)(1))**

There were 46 wells with readings that exceeded the limits set forth in BAAQMD Regulation 8-34-305 during the reporting period. Corrective action was initiated within the

required five-day time period and re-monitoring was completed within 15 days of the deviation pursuant to BAAQMD Regulation 8-34-414. See Appendix K, Wellfield Deviation Log, for further details.

### **2.11.2 Higher Operating Value (HOV) Wells**

As of March 31, 2017, the following wells approved to operate at a HOV.

#### **Oxygen HOV Wells**

Pursuant to Permit Condition 10164, Part 18(b)(i), the oxygen concentration limit does not apply to the well listed, provided that the oxygen concentration in the LFG at the main header does not exceed 15 percent oxygen by volume (dry basis). The applicable wells are: OXMEW-W17 and HC-F06.

#### **Oxygen and Pressure HOV Wells**

Pursuant to the notification and request for HOVs sent to the BAAQMD on November 3, 2015, the oxygen concentration limit does not apply to the wells listed below, provided that the oxygen concentration in the LFG at the main header does not exceed 15 percent oxygen by volume (dry basis). The BAAQMD responded to this request on May 6, 2016 by providing language to the current Title V Permit that the following wells may operate under LTCO. Cornerstone, on behalf of Republic, responded to the BAAQMD on May 24, 2016 that the provided language was acceptable. The BAAQMD issued a revised Title V permit on September 22, 2016 approving the HOV wells. Pursuant to Permit Condition 10164 Part 18(d)(iii), the oxygen concentration limit does not apply to the wells listed, provided that the oxygen concentration in the LFG at the main header does not exceed 15 percent oxygen by volume (dry basis). The wells to which these HOV values apply are as follows: LTS-1, LTS-2, LTS-3, LTS-4, LTS-5, LTS-6, LTS-7, LTS-8, LTS-9, LTS-10, LTS-11, and LTS-12

### **2.12 Gas Flow and Temperature Monitoring Results (BAAQMD 8-34-501.10, 8-34-508, & §60.757(f)(1))**

The LFG flow rate is measured with a flow meter. The data panel displays the LFG flow and the digital Yokogawa data recorder records LFG flow every two minutes. The flow meter at each flare meets the requirements of BAAQMD Regulation 8-34-508 by recording data at least once every 15 minutes. The flow meter is maintained and calibrated pursuant to manufacturer's recommendations. The flow data for each flare is available for review at Ox Mountain.

Appendix L contains a summary of the monthly LFG flow rates for the flares. Appendix F contains the Flare Flow and Temperature Deviation/ Inoperative Monitor/Missing Data

Report for October 1, 2016 through March 31, 2017. There were no issues encountered during the reporting period.

### **2.13 Compliance with §60.757(f)(6)**

*"The date of installation and the location of each well or collection system expansion added pursuant to (a)(3), (b), (c)(4) of §60.755."*

The GCCS was improved pursuant to Title V Permit Number A2266 during the reporting period.

A total of four wells were started up during the reporting period pursuant to Permit Condition 10164, Part 17b(i). Well Startup Notification Letters that were prepared by Cornerstone and submitted on behalf of Republic to the BAAQMD are included in Appendix B.

As of March 31, 2017, Permit Condition 10164, Part 17b(i) still allows for the replacement of an unlimited number of vertical wells, installation of up to 85 new vertical wells, installation of up to 20 new horizontal collectors, the decommissioning of up to 137 vertical wells, and the decommissioning of up to 15 horizontal collectors.

As of March 31, 2017 Ox Mountain consists of 170 vertical wells, nine horizontal collectors, two leachate collection risers, and 12 trench collectors.

### **2.14 Compliance with Title V Permit Condition Number 10164, Part 5**

The unpaved segment of road extending from the end of the paved haul road to the working face does not exceed the 1,200 foot length limit.

### **2.15 Compliance with Title V Permit Condition Number 10164, Part 6**

Ten mile per hour (MPH) speed limit signs are posted on sections of unpaved roads.

### **2.16 Compliance with Title V Permit Condition Number 10164, Part 7**

All unpaved roads (excluding limited use access roads) were treated with ten percent magnesium chloride dust suppressant solution at a rate of at least once per calendar month. From October 1, 2016 through March 31, 2017, dust suppressant was applied after any dry period consisting of 30 consecutive days with less than 0.09 inches of rain per day. In addition, water was applied to all unpaved roads at least four times per working day. The watering schedule was reduced during periods of sufficient precipitation to minimize dust emissions. These records are maintained at Ox Mountain and are available upon request.

## 2.17 Compliance with Title V Permit Condition Number 10164, Part 8

All paved roadways were swept and washed down at least twice per week or as necessary to maintain a clean road surface.

## 2.18 Compliance with Title V Permit Condition Number 10164, Part 9

On-site vehicle traffic volume did not exceed the number of round trips described in Table 2-2 during any one day:

**TABLE 2-2 - ON-SITE VEHICLE TRAFFIC VOLUME**

Vehicle Type	Daily Round Trip Limits
Transfer Trucks	178
Packer Trucks	52
Water Trucks	36
Soil Trucks	200
Misc. Heavy Duty Equipment	60
Light Duty Vehicles	250

## 2.19 Compliance with Title V Permit Condition Number 10164, Part 10

Except for the vehicles listed in Table 2-3, the on-site one way distance traveled by any heavy-duty vehicle (on paved roads only) did not exceed 8,000 feet. This limitation does not apply to the vehicles listed in Table 2-3, which may travel up to a maximum of 11,700 feet (one-way distance) on paved roads.

**TABLE 2-3 - VEHICLE TRAFFIC**

Vehicle Type	Daily Round Trip Limits
Water Truck	36
Fuel Trucks	2
Employee - Light Duty Equipment	20

## 2.20 Compliance with Title V Permit Condition Number 10164, Part 13

No contaminated soil containing volatile organic compound (VOC) concentrations greater than 50 ppmv was received during this reporting period. VOC-laden soil (containing less than 50 ppmv of VOCs) was received during this reporting period. The total VOC-laden soil placed did not exceed the 118.75 ton daily limit or the 31,800 ton yearly limit.



## **2.21 Compliance with Title V Permit Condition Number 16315 for S-12 Stockpile or Green Waste**

Appendix N contains monthly and 12-month rolling records of the amount of yard and green waste received for this reporting period. These records are maintained at Ox Mountain and are available upon request.

## **2.22 Compliance with Title V Permit Condition Number 26216 and 25107 for S-5 Non-Retail Gasoline Dispensing Facility G#8524**

Pursuant to Title V Permit Condition Number 26216 and Regulation 2-5, the facility's annual gasoline throughput did not exceed the 400,000 gallon (gal) limit in any consecutive 12-month period. Monthly gasoline throughput totals for the reporting period are included in Appendix P. These records are maintained at Ox Mountain and are available upon request.

Pursuant to Title V Permit Condition Number 25107, the Static Pressure Performance Test (Leak Test) for ST-38 was performed on November 21, 2016. The Static Pressure Performance Test results are included in Appendix O.

## **2.23 Compliance with Draft Title V Permit Condition Number 10164, Part 20**

Pursuant to Title V Permit Condition Number 10164 Part 20, the facility's combined LFG flow rate to the flares (A-7, A-8, and A-9) did not exceed 2,155,000,000 standard cubic feet (scf) corrected to 50 percent methane (dry basis, 70°F, one atmosphere) in any consecutive 12-month period. Monthly combined LFG flow rates to the flares for the reporting period are included in Appendix L. These records are maintained at Ox Mountain and are available upon request.

## **2.24 Compliance with Draft Title V Permit Condition Number 10164, Part 21**

Pursuant to Title V Permit Condition Number 10164 Part 21, the facility's total reduced sulfur (TRS) compounds in the collected landfill did not exceed 265 ppmv as hydrogen sulfide (H<sub>2</sub>S) averaged over any consecutive rolling 12-month period. Monthly 12-month rolling averages of TRS as H<sub>2</sub>S for the reporting period are included in Appendix P. These records are maintained at Ox Mountain and are available upon request.

## **2.25 Compliance with Draft Title V Permit Condition Number 10164, Part 22**

Pursuant to Title V Permit Condition Number 10164 Part 22, the facility's annual average LFG generation did not exceed 6,600 standard cubic feet per minute (scfm). Also pursuant to Part 22, fugitive annual average LFG emissions rates, assumed to comprise 25 percent by volume of the LFG generation rate, did not exceed 1,650 scfm. Twelve-month rolling LFG generation rates are included in Appendix L.

Pursuant to Title V Permit Condition Number 10164 Part 22, toxic air contaminant (TAC) emissions from waste decomposition (S-1) will be determined from the annual LFG characterization analysis (Source Test) to determine compliance with the emission rate limits listed in Part 22(b). The 2016 Source Test was performed on September 13, 2016 and was included in Appendix N of the previous report submitted to the BAAQMD and United States Environmental Protection Agency (USEPA) Region IX on October 31, 2016.



### 3 PERFORMANCE TEST REPORT

In accordance with BAAQMD Rule 8-34-413 and 40 CFR §60.757(g) in the NSPS, a Performance Test Report is required to be submitted from affected facilities containing performance and monitoring data for the operation of the GCCS. The operational records listed in Table 3-1 have been reviewed, summarized, and are included in the following table. A copy of the most recent Performance Tests, conducted on September 13, 2016 for the A-7, A-8, and A-9 Flares, was included in Appendix N of the previous report, which was submitted to the BAAQMD and USEPA Region IX on October 31, 2016.

**TABLE 3-1 - PERFORMANCE TEST REQUIREMENTS**

Rule	Requirement	Location in Report
8-34-412, §60.8, §60.752(b)(2)(iii)(B), §60.754(d)	Compliance Demonstration Test	Section 3.1
§60.757(g)(1)	A diagram of the collection system showing collection system positioning including all wells, horizontal collectors, surface collectors, or other gas extraction devices, including the locations of any areas excluded from collection and the proposed sites for future collection system expansion.	Section 3.2, Appendix A
§60.757(g)(2)	The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based.	Section 3.3
§60.757(g)(3)	The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material.	Section 3.4
§60.757(g)(4)	The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area.	Section 3.5
§60.757(g)(5)	The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill.	Section 3.6
§60.757(g)(6)	The provisions for the control of off-site migration.	Section 3.7, Appendix M

#### 3.1 Flare (A-7, A-8, and A-9) Compliance Demonstration Test Results BAAQMD 8-34-412)

The Compliance Demonstration Test (Performance Test) was performed on the A-7, A-8, and A-9 Flares by Blue Sky Environmental, Inc. (Blue Sky) on September 13, 2016, pursuant to BAAQMD Regulation 8-34-412. A copy of the Performance Test Report was included in

Appendix N of the previous report, which was submitted to the BAAQMD and USEPA Region IX on October 31, 2016.

### **3.2 Compliance with §60.757(g)(1)**

*"A diagram of the collection system showing collection system positioning including wells, horizontal collectors..."*

A map of the LFG collection system showing the location of all vertical wells, horizontal collectors, and other LFG extraction devices is included in Appendix A.

### **3.3 Compliance with §60.757(g)(2)**

*"The data upon which the sufficient density of wells, horizontal collectors, surface collectors, or other gas extraction devices and the gas mover equipment sizing are based."*

The existing GCCS consists of LFG wells and collectors spaced in accordance with standard industry practices. Based on continuous compliance and operational experience the installed collector density appears adequate for controlling surface emissions and subsurface LFG migration.

The landfill operator will conduct routine monitoring in accordance with NSPS requirements. If the GCCS at the landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified as required.

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates (based on quarterly SEM results and monthly wellhead readings). New emission control devices will be designed and permitted as appropriate for future LFG generation rates.

### **3.4 Compliance with §60.757(g)(3)**

*"The documentation of the presence of asbestos or non-degradable material for each area from which collection wells have been excluded based on the presence of asbestos or non-degradable material."*

Segregated areas or accumulations of asbestos material were not documented for the site in the GCCS Design Plan. Therefore, §60.757(g)(3) is not applicable.

### **3.5 Compliance with §60.757(g)(4)**

*"The sum of the gas generation flow rates for all areas from which collection wells have been excluded based on non-productivity and the calculations of gas generation flow rate for each excluded area."*

There are no non-productive areas that have been excluded from the coverage of the GCCS. Therefore, §60.757(g)(4) is not applicable.

### **3.6 Compliance with §60.757(g)(5)**

*"The provisions for increasing gas mover equipment capacity with increased gas generation flow rate, if the present gas mover equipment is inadequate to move the maximum flow rate expected over the life of the landfill."*

The existing GCCS conveyance piping and emission control devices have sufficient capacity to handle all current and future LFG flow rates. New emission control devices will be designed and permitted as appropriate for future LFG generation rates.

### **3.7 Compliance with §60.757(g)(6)**

*"The provisions for the control of off-site migration."*

Quarterly LFG migration monitoring, including all probes and on-site buildings, occurred on the following dates:

- Fourth Quarter 2016 – October 18 and 27, and December 13, 2016; and
- First Quarter 2017 – January 31 and March 30, 2017.

In the Fourth Quarter of 2016 and First Quarter of 2017, no methane gas in excess of the lower explosive limit (LEL) of five percent by volume was detected at any perimeter gas probe location tested.

The LFG Probe and In-Structure Monitoring Reports are included in Appendix M of this report.

The landfill operator will continue surface and perimeter monitoring in accordance with the approved monitoring plans. If the GCCS at the landfill does not meet the measures of performance set forth in the NSPS, the GCCS will be adjusted or modified in accordance with the NSPS requirements.



## **4 START-UP, SHUTDOWN, MALFIUNCTION (SSM) PLAN**

### **4.1 SSM Log for the GCCS at Ox Mountain**

The NESHAP contained in 40 CFR Part 63, AAAA for MSW landfills include the regulatory requirements for submittal of a semi-annual report (under 40 CFR §63.10(d)(5) of the general provisions) if an SSM event occurred during the reporting period. The reports required by §63.1980(a) of the NESHAP and §60.757(f) of the NSPS summarize the GCCS exceedances. These two semi-annual reports contain similar information and have been combined as allowed by §63.10(d)(5)(i) of the General Provisions.

NESHAP 40 CFR part 63, AAAA became effective on January 16, 2004. Those SSM events that occurred during the NSPS semi-annual reporting period are reported in this section (October 1, 2016 through March 31, 2017). The following information is included as required:

- During the reporting period, there were 28 SSM events at the A-7 Flare. Additional details are available in the SSM log for the A-7 flare located in Appendix D, Flare SSM Log.
- During the reporting period, eight SSM events occurred at the A-8 Flare. The A-8 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 54 SSM events occurred at the A-9 Flare. The A-9 Flare was shut down and restarted during the reporting period due to the reasons noted in Appendix D, Flare SSM Log.
- During the reporting period, 12 SSM events occurred in the wellfield. Details are included in Appendix C, Well SSM Log.
- There were 102 events in total. In all 102 events, automatic systems and operator actions were consistent with the standard operating procedures contained in the SSM Plan. There were no deviations from the SSM plan.
- There were no identified exceedances during the reporting period of any applicable emission limitation in the landfills NESHAP (§63.10(d)(5)(i)).
- Revisions of the SSM Plan to correct deficiencies in the landfill operations or procedures were neither required, nor prepared (§63.6(e)).



**Attachments:**

**Combined Title V Semi-Annual and Partial 8-34 Annual Report**

*I certify the following:*

*Based on information and belief formed after reasonable inquiry,  
information on the startup, shutdown, malfunction forms, all  
accompanying reports, and other required certifications are true,  
accurate, and complete.*

  
\_\_\_\_\_  
**Signature of Responsible Official**

4/11/17  
\_\_\_\_\_  
**Date**

Michael Mahoney  
\_\_\_\_\_  
**Name of Responsible Official**